

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**DEBORAH J. SULENSKI,**

Plaintiff,

Case No.

-vs-

HON.

**UNUM LIFE INSURANCE COMPANY  
OF AMERICA,  
a Maine corporation,**

Defendant.

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CHARLES W. PALMER (P29271)  
Attorney for Plaintiff  
140 Elm Street  
Wyandotte, MI 48192  
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cpalmerpc@sbcglobal.net

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**COMPLAINT**

Plaintiff, Deborah J. Sulenski, by and through her attorney, Charles W. Palmer, P.C., says as follows:

1. Plaintiff is a resident of the City of Walled Lake, Oakland County, Michigan.
2. Defendant UNUM Life Insurance Company of America is a Maine corporation, which is doing business in the State of Michigan.
3. This Court has jurisdiction pursuant to ERISA, 29 U.S.C. §1132(e) and 28 U.S.C. §1131.
4. Venue in this Court is appropriate because the actions complained of herein occurred in the Eastern District of Michigan, Southern Division.
5. Plaintiff was the beneficiary of a long-term disability contract with defendant UNUM Life Insurance Company of America through her former employer.

6. Defendant has denied plaintiff's appeal of its decision denying continuing long-term disability benefits after July 17, 2015.

7. Plaintiff has exhausted all administrative remedies prior to bringing this action.

8. Plaintiff's claim seeks to recover benefits, enforce rights, including a clarified right to future benefits under 29 U.S.C. §1132(a)(i)(B).

9. Defendant's denial of plaintiff's long-term disability benefits was arbitrary and capricious and is not supported by substantial evidence in the administrative record.

WHEREFORE, plaintiff requests this Honorable Court enter judgment for plaintiff against defendant for damages, including past, present and future long-term disability benefits and attorney fees pursuant to 29 U.S.C. §1132, and any other relief this Court deems equitable, just and proper.

Dated: March 1, 2016

Respectfully submitted,

s/ Charles W. Palmer

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#### **CERTIFICATION OF SERVICE**

I hereby certify that on March 1, 2016, I electronically filed the foregoing Complaint with the Clerk of the Court using the ECF system.

s/ Charles W. Palmer

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